

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**KIM K. SUMNER,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO. 1:13-cv-00539-JRG**

**MARYLAND JUDICIARY /  
DISTRICT COURT OF MARYLAND,  
*et al.*,**

**Defendants.**

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**PLAINTIFF'S RENEWED MOTION TO STAY PROCEEDING  
DURING PENDENCY OF SETTLEMENT NEGOTIATIONS**

Plaintiff, Kim K. Summer, by undersigned counsel, renews her motion to stay the above-captioned proceeding in light of ongoing settlement negotiations:

1. As previously advised, undersigned counsel tendered a detailed written settlement demand to Defendants' counsel on or about February 9, 2015.
2. On March 13, counsel for the respective parties met in person and conducted a two-hour discussion of settlement terms and considerations, during which a settlement offer was tendered by Defendants' counsel.
3. Undersigned counsel subsequently tendered a counter offer and is awaiting a response thereto.
4. Undersigned counsel believes that preservation of the *status quo* is crucial to the prospects of settlement.

5. In the event that a tentative settlement agreement can be reached, undersigned counsel is advised that approval by the Maryland Board of Public Works will be required for the settlement to become effective.

6. Defendants' counsel expressly declined to join in a motion for stay.

**WHEREFORE**, Plaintiff renews her request for a stay of the instant proceeding.

Date: March 16, 2015.

/s/ GERARDINE M. DELAMBO,  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of March, 2015, a copy of the foregoing Motion was served electronically upon Defendant's counsel, Michele J. McDonald, Assistant Attorney General, at mmcdonald@oag.state.md.us.

/s/ GERARDINE M. DELAMBO